

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PARKER-HANNIFIN CORPORATION, and PARKER INTANGIBLES, LLC,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	C.A. No. 06-751-MPT
	:	
ZIPPERTUBING (JAPAN), LTD.,	:	
	:	
Defendant.	:	
<hr style="border: 0.5px solid black;"/>		
PARKER-HANNIFIN CORPORATION, and PARKER INTANGIBLES, LLC,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	C.A. No. 07-104-MPT
	:	
SEIREN CO., LTD.,	:	
	:	
Defendant.	:	
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**DECLARATION OF KEITH A. WALTER, JR IN SUPPORT OF PLAINTIFFS’
CONSOLIDATED CLAIM CONSTRUCTION ANSWERING BRIEF**

I, Keith A. Walter, Jr., do hereby declare:

1. I am a member of the bar of the State of Delaware and have been admitted to practice before this Court.
2. I am an attorney at the law firm of Connolly Bove Lodge and Hutz LLP, counsel for Plaintiffs, Parker-Hannifin Corporation and Parker Intangibles, LLC in this matter. I make this Declaration in support of Plaintiffs Parker-Hannifin Corporation and Parker Intangibles, LLC’s, Consolidated Claim Construction Answering Brief.
3. Attached hereto as Exhibit A is a true and correct copy of selected pages from Webster’s Ninth New Collegiate Dictionary (Merriam-Webster, 1987).

I hereby declare under penalty of perjury that all of the statements made by me
herein are true.

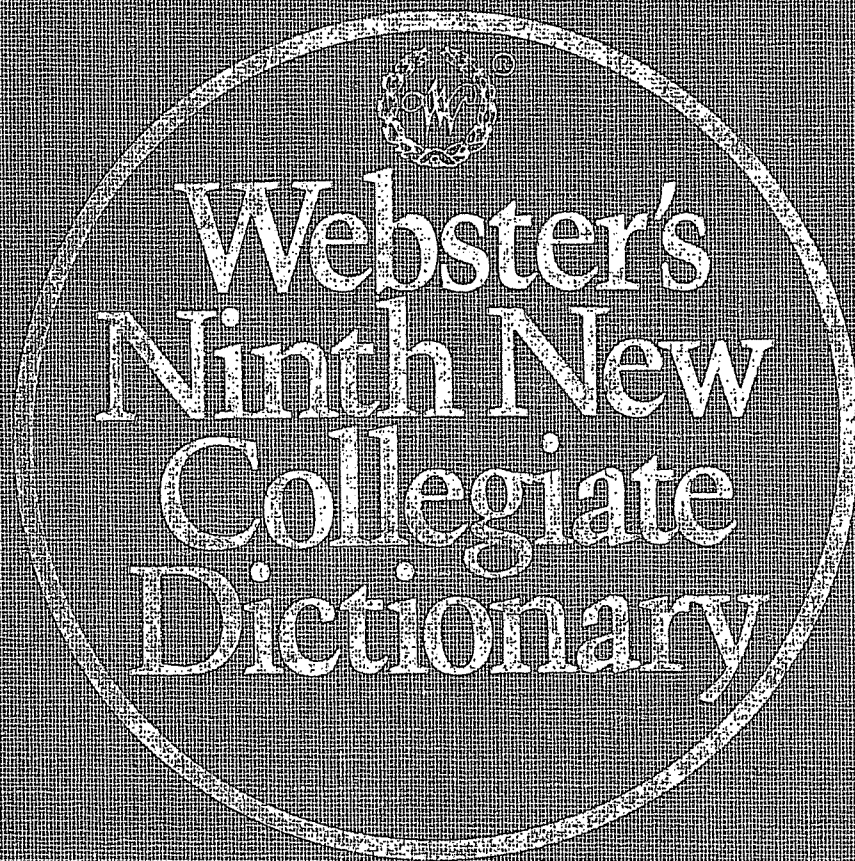
Dated: July 15, 2008

A handwritten signature in black ink, appearing to read "Keith Walter, Jr.", with a long horizontal flourish extending to the right.

Keith A. Walter, Jr.

EXHIBIT

A





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bottle *n* (1943) : a club that serves patrons alcoholic drinks after normal legal closing hours from supplies they have previously purchased or reserved
bottled gas *n* (1930) : gas under pressure in portable cylinders
bottle-fed \ˈbɑt-ṽ-fed\ *v* -fed; -feed-ing (1865) : to feed (as an infant) with a bottle
bottle gourd *n* (ca. 1828) : a common cultivated gourd (*Lagenaria siceraria*) with a variably shaped fruit that is sometimes used as a container
bottle green *n* (1816) : a dark green
bottle-neck \ˈbɑt-ṽ-nek\ *adj* (1896) : NARROW (~ harbors)
bottle-neck *n* (1907) 1 a : a narrow route b : a point of traffic congestion 2 a : a condition or situation that retards or halts free movement and progress b : IMPASSE 3 : a style of guitar playing in which glissando effects are produced by sliding an object (as a knife blade or the neck of a bottle) along the strings
**bottle-neck v (1937) : to slow or halt by causing a bottleneck
bottle-nosed dolphin \ˈbɑt-ṽ-nōz-\ *n* (ca. 1909) : any of various moderately large stout-bodied toothed whales (genus *Tursiops* and esp. *T. truncatus*) with a prominent beak and falcate dorsal fin
**bottle-nosed dolphin n (1940) : BOTTLE-NOSED DOLPHIN
bottlenose \ˈbɑt-lin-ṽ-in\ *n* (1954) : a beverage and esp. a wine that is bottled
bottom \ˈbɑt-əm\ *n* [ME *botme*, fr. OE *botm*; akin to OHG *bodam* bottom, L *fundus*, Gk *pythmnē*] (bef. 12c) 1 a : the underside of something b : a surface designed to support something resting on it c : the posterior end of the trunk : BUTTOCKS, RUMP 2 : the surface on which a body of water lies 3 a : the lowest part or place b : the rearmost or innermost point c : the lowest or last place in point of precedence (started work at the ~) d : the trousers or short pants of pajamas — usu. used in pl. e : the last half of an inning of baseball f : the bass or baritone instruments of a band 5 : low-lying land along a watercourse — usu. used in pl. 6 : BASIS, SOURCE 7 : capacity (as of a horse) to endure strain 8 : the main plowing mechanism of a plow 9 : a foundation color applied to textile fibers before dyeing 10 : a quantum characteristic ascribed to certain massive fundamental particles that accounts for the existence and lifetime of upsilion particles and has a value of zero for most known particles — **bottomed** \-əmd\ *adj* (1767) : to collect plants esp. on a field
bottom adj (14c) 1 : of, relating to, or situated at the bottom (~ rock) 2 : frequenting the bottom (~ fish)
**bottom v (1544) 1 : to furnish with a bottom 2 : to provide a foundation for 3 : to bring to the bottom 4 : to get to the bottom of ~
~ 1 : to become base 2 : to reach the bottom — **bot-tom-er** *n*
bottom-land \ˈbɑt-əm-land\ *n* (1728) : BOTTOM 5
bottom-less \-ləs\ *adj* (14c) 1 : having no bottom (a ~ chair) 2 a : extremely deep b : impossible to comprehend : UNFATHOMABLE (a ~ mystery) c : BOUNDLESS, UNLIMITED 3 a [fr. the absence of lower as well as upper garments] : NUDE (~ dancers) b : featuring nude entertainers — **bottom-less-ly** *adv* — **bot-tom-less-ness** *n*
bottom-line \ˈbɑt-əm-līn\ *adj* (1972) 1 : concerned only with cost or profits 2 : PRAGMATIC, REALISTIC
bottom-line n (1967) 1 a : the essential or salient point : CRUX b : the primary or most important consideration 2 a : the line at the bottom of a financial report that shows the net profit or loss b : financial considerations (as cost or profit or loss) c : the final result : OUTCOME, UPSHOT
bottom-most \ˈbɑt-əm-mōst\ *adj* (1861) 1 a : situated at the very bottom : LOWEST, DEEPEST b : LAST (the ~ part of the day — Alfred Kazin) 2 : most basic (the ~ problems facing the world)
bottom out v (1958) : to reach a low point before rebounding (the market will **bottom out in July)
bottom round *n* (1923) : meat (as steak) from the outer part of a round of beef
bot-u-lin \ˈbɑch-a-lən\ *n* [prob. fr. NL *botulinum*] (ca. 1900) : a toxin that is formed by the botulinum and is the direct cause of botulism
bot-u-li-num \ˈbɑch-a-li-nəm\ also **bot-u-li-nus** \-nəs\ *n* [NL, fr. L *botulus* sausage] (1902) : a spore-forming bacterium (*Clostridium botulinum*) that secretes botulin — **bot-u-li-na-l** \-līn-ṽl\ *adj*
bot-ulism \ˈbɑch-a-liz-əm\ *n* (1887) : acute food poisoning caused by botulin in food
bou \-(ə)-riŋ\ [perh. fr. *bou*, *bū*, *bū*-*n* [native name in Mali] (1961) : a long flowing garment worn in parts of Africa
bou-chee \bi-ˈshā\ *n* [Fr. lit., mouthful, fr. (assumed) VL *buccata*, fr. L *bucca* cheek, mouth — more at POKK] (1846) : a small patty shell usu. containing a creamed filling
bou-clé or **bou-clé** \bū-ˈklā\ *n* [F *bouclé* curly, fr. pp. of *boucler* to curl, fr. *bocle* buckle; curl] (1895) 1 : an uneven yarn of three plies one of which forms loops at intervals 2 : a textile fabric of bouclé yarn
bou-doir \ˈbud-wär, -bud-\ *n* [F, fr. *boudoir* to pout] (1781) : a woman's dressing room, bedroom, or private sitting room
bou-fant \bū-ˈfāt, -bū-\ *adj* [F, fr. MF, fr. prp. of *bouffer* to puff] (1880) : puffed out (~ hairdos) (a ~ veil)
bou-gain-vil-lea also **bou-gain-vil-laee** \bü-ˈgän-ˈvil-yä, bö-, bü-, -vë-(y)\ *n* [NL; fr. Louis Antoine de Bougainville] (1881) : any of a genus (*Bougainvillea*) of the four-o'clock family of ornamental tropical American woody vines with brilliant purple or red floral bracts
bough \baʊ\ *n* [ME; shoulder, bough, fr. OE *bög*; akin to OHG *buog* shoulder, Gk *pechyis* forearm] (bef. 12c) : a branch of a tree; esp. : a main branch — **boughed** \baud\ *adj*
bought \ˈboʊt\ *adj* [pp. of buy] (1599) : STORE 2 (~ clothes)
boughten \-ən\ *adj* [thought + -en (as in forgotten)] chiefly dial (1793) : BOUGHT (the only ~ carpet in the region — H. W. Thompson)
bou-gie \bü-ˈzhē, -jē\ *n* [F, fr. *Bougie*, seaport in Algeria] (1755) 1 : a wax candle 2 a : a tapering cylindrical instrument for introduction into a tubular passage of the body b : SUPPOSITORY
boul-lai-baisse \bü-ya-ˈbas, -bü-yä-\ *n* [F] (1855) 1 : a highly seasoned fish stew made with at least two kinds of fish 2 : POTPOURRI
bouillon \ˈbu(l)-yan, -bü(-), -bü-yan\ *n* [F, fr. OF *boillon*, fr. *boillir* to boil] (ca. 1656) : a clear seasoned soup made usu. from lean beef
bouillon cube *n* (ca. 1922) : a cube of evaporated seasoned meat extract
boulder \ˈbol-dər\ *n* [short for *boulder stone*, fr. ME *bulder ston*, part trans. of a word of Scand origin; akin to Sw dial. *bullersten* large stone, trans.********

in a stream, fr. *buller* noise + *sten* stone] (1617) : a detached and rounded or much-worn mass of rock — **boul-dered** \-dərdəd *adj* — **boul-der-y** \-d(ə)-rē *adj*

¹**boule** \-'bü-, -jē, bü-'lā *n* [Gk *boulē*, lit., will, fr. *boulesthai* to wish] (1846) : a legislative council of ancient Greece consisting first of an aristocratic advisory body and later of a representative senate

²**boule** \-'büil *n*, [F, ball — more at **BOWL**] (1918) : a pear-shaped mass (as of sapphire) formed synthetically in a special furnace with the atomic structure of a single crystal

boul-le-vard \-'büł-ə-, -vård, 'büł-'n *n* [F, modif. of MD *bolwerck* bulwark] (1769) : a broad often landscaped thoroughfare

boul-le-vard-i-er \-'büł-ə-, -vår-'dyā, 'büł-, -'di(ə)r *n* [F, fr. *boulevard* + *-ier* -er] (1879) : a frequenter of the Parisian boulevards; *broadly* : MAN-ABOUT-TOWN

bou-le-ver-se-ment \-'büł-(ə)-vēr-sə-mān *n* [F] (1782) 1 : REVERSAL 2 : a violent disturbance : DISORDER

boulle \-'büil, 'byü(ə)l *n* [André Charles *Boulle* †1732 Fr. cabinetmaker] (1823) : inlaid decoration of tortoiseshell, yellow metal, and white metal in cabinetwork

¹**bounce** \-'baun(t)s *vb* **bouncing** [ME *bousen*] *vt* (13c) 1 *obs* : BEAT, BUMP 2 : to cause to rebound (~ a ball) 3 *a* : DISMISS, FIRE *b* : to expel precipitately from a place 4 : to issue (a check) drawn on an account with insufficient funds ~ *vi* 1 : to rebound after striking 2 : to recover from a blow or a defeat quickly — *usu.* used with *back* 3 : to be returned by a bank because of insufficient funds in a checking account [his checks ~] 4 *a* : to leap suddenly : BOUND *b* : to walk with springing steps 5 : to hit a baseball so that it hits the ground before it reaches an infield

²**bounce** *n* (1523) 1 *a* : a sudden leap or bound *b* : REBOUND 2 : BLUSTER 3 : VERVE, LIVELINESS

bouncer \-'baun(b)-sər *n* (1865) : one that bounces : *a* : one employed to restrain or eject disorderly persons *b* : a batted baseball that bounces

bouncing \-'siŋ *adj* (1563) 1 : LIVELY, ANIMATED 2 : enjoying good health : ROBUST — **bounc-ing-ly** \-'siŋ-lē *adv*

bouncing bet \-'bet *n*, often *cap* 2d *B* [fr. *Bet*, nickname for *Elizabeth*] (ca. 1817) : a European perennial herb (*Saponaria officinalis*) of the pink family that is widely naturalized in the U.S. and has pink or white flowers and leaves which yield a detergent when bruised — called also *soapwort*

bouncy \-'baun(t)-sə *adj* **bounc-i-er**; -est (1921) 1 : BUOYANT, EXUBERANT 2 : RESILIENT 3 : marked by or producing bounces — **bounc-i-ly** \-'sə-lē *adv*

¹**bound** \-'baund *adj* [ME *boun*, fr. ON *būinn*, pp. of *būa* to dwell, prepare; akin to OHG *būan* to dwell — more at **BOWER**] (13c) 1 *archaic* : READY 2 : intending to go : GOING (~ for home) [college-bound]

²**bound** *n* [ME, fr. OF *borne*, fr. ML *bodina*] (13c) 1 *a* : a limiting line : BOUNDARY — *usu.* used in pl. *b* : something that limits or restrains [beyond the ~s of decency] 2 *usu pl* *a* : BORDERLAND *b* : the land within certain bounds 3 : a number greater than or equal to every number in a set (as the range of a function); *also* : a number less than or equal to every number in a set

³**bound** *vt* (14c) 1 : to set limits or bounds to : CONFINE 2 : to form the boundary of : ENCLOSE 3 : to name the boundaries of

⁴**bound** *adj* [ME *bouden*, fr. pp. of *binden* to bind — more at **BIND**] (13c) 1 *a* : fastened by or as if by a band : CONFINED [desk-bound] *b* : very likely : SURE (~ to rain soon) 2 : placed under legal or moral restraint or obligation : OBLIGED [duty-bound] 3 : made costive : CONSTIPATED 4 *of a book* : secured to the covers by cords, tapes, or glue 5 : DETERMINED, RESOLVED 6 : held in chemical or physical combination (~ water in a molecule) 7 : always occurring in combination with another linguistic form (*un-* in *unknown* and *-er* in *speaker* are ~ forms) — compare 1 **FREE** 11d

⁵**bound** *n* [MF *bond*, fr. *bondir* to leap, fr. (assumed) VL *bombitire* to hum, fr. L *bombus* deep hollow sound — more at **BOMB**] (1553) 1 : LEAP, JUMP 2 : the action of rebounding : BOUNCE

⁶**bound** *vi* (1592) 1 : to move by leaping 2 : REBOUND, BOUNCE

bound-ary \-'baun-d(ə)-rē *n*, *pl* -aries (1626) : something that indicates or fixes a limit or extent; *specif* : a bounding or separating line, point, or plane

boundary layer *n* (ca. 1921) : a region of retarded fluid near the surface of a body which moves through a fluid or past which a fluid moves

bound-en \-'baun-dən *adj* [ME] (14c) 1 *archaic* : being under obligation : BEHOLDEN 2 : made obligatory : BINDING [our ~ duty]

bound-er \-'dər *n* (1505) 1 : one that bounds 2 : a man of objectionable social behavior : CAD

bound-less \-'baun-dləs *adj* (1592) : having no boundaries : VAST — **bound-less-ly** *adv* — **bound-less-ness** *n*

bound up *adj* (1611) : closely involved or associated — *usu.* used with *with*

boun-te-ous \-'baunt-ē-əs *adj* [ME *bountevous*, fr. MF *bontif* kind, fr. OF, fr. *bonté*] (14c) 1 : giving or disposed to give freely 2 : liberally bestowed — **boun-te-ous-ly** *adv* — **boun-te-ous-ness** *n*

boun-tied \-'baunt-ēd *adj* (1788) 1 : having the benefit of a bounty 2 : rewarded or rewardable by a bounty

boun-ti-ful \-'baunt-i-fəl *adj* (1508) 1 : liberal in bestowing gifts or favors 2 : given or provided abundantly (a ~ harvest) *syn* *see* **LIBERAL** — **boun-ti-ful-ly** \-(fə)-lē *adv* — **boun-ti-ful-ness** \-'fəl-nəs *n*

boun-ty \-'baunt-ē *n*, *pl* *bounties* [ME *bounte* goodness, fr. OF *bonté*, fr. L *bonitas*, fr. *bonus* good, fr. OL *duenos*; akin to MHG *ziden* to grant, L *bene* well] (13c) 1 : something that is given generously 2 : liberality in giving : GENEROSITY 3 : yield esp. of a crop 4 : a reward, premium, or subsidy esp. when offered or given by a government : as *a* : an extra allowance to induce entry into the armed services *b* : a grant to encourage an industry *c* : a payment to encourage the destruction of noxious animals *d* : a payment for the capturing or assisting in capturing an outlaw

\ə abut \ə kitten, F table \ər further \ə ash \ā ace \ā cot, cart
au out \ə chin \e bet \e easy \g go \i hit \i ice \j job
ŋ sing \ō go \ō law \ōi boy \th thin \th the \ü foot \ü foot
v vet \zh vision \k, k, n, ce, ce, ue, ue, ŷ see Guide to Pronunciation

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2008, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to counsel of record on the Court's CM/ECF registrants for this case. I further certify that on July 15, 2008, I caused a copy of the foregoing document to be served upon the following in the manner indicated:

BY E-MAIL AND HAND DELIVERY

William J. Marsden, Jr.
FISH & RICHARDSON P.C.
919 N. Market Street, Suite 1100
P.O. Box 1114
Wilmington, DE 19899-1114
marsden@fr.com

BY E-MAIL

John P. Pegram
Michael T. Zoppo
FISH & RICHARDSON P.C.
Citigroup Center
153 East 53rd Street, 52nd Floor
New York, NY 10022-4611
peggram@fr.com
zoppo@fr.com

/s/ Francis DiGiovanni

Francis DiGiovanni (#3189)